

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

ASHLEE GONZALEZ,  
INDIVIDUALLY AND AS  
DEPENDENT ADMINISTRATOR OF  
AND ON BEHALF OF THE ESTATE  
OF MELISSA DE LA CRUZ, AND  
MELISSA DE LA CRUZ'S HEIR(S)-  
AT-LAW AND WRONGFUL DEATH  
BENEFICIARIES; AND ARACELI DE  
LA CRUZ, INDIVIDUALLY

V.

HIDALGO COUNTY, TEXAS

[illegible]

CIVIL ACTION NO. 7:25-cv-00177

## JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

NOW COME, Plaintiffs and Defendant and file this Joint Motion for Entry of an Agreed Protective Order in the above styled and numbered cause and would respectfully show unto this court as follows:

1. All parties have agreed that it is necessary to enter into an Agreed Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure ("FRCP") to protect any document, information, or other tangible or intangible thing (collectively, "documents") furnished by a party to any other party, as well as documents furnished by non-parties who receive subpoenas in connection with this action, if and when the documents are designated by a party or non-party as "Confidential Information" in accordance with the terms of the Agreed Protective Order attached hereto as **Exhibit A**.

2. All parties further agree that the Agreed Protective Order shall also apply to copies,

excerpts, abstracts, analyses, summaries, descriptions, or other forms of recorded information or data containing, reflecting, or disclosing all or parts of designated documents.

3. Information designated as "Confidential Information" may only be used for purposes of preparation, trial, and appeal of this action. Unless the parties otherwise agree in a signed writing, "Confidential Information" must not be used by the party receiving the same under any circumstances or for any other purpose.

4. The parties have agreed to the terms of the proposed Agreed Protective Order and believe that it is necessary because this case involves the production of sensitive documents and tangible items which comprise the records of a law enforcement agency, e.g., Hidalgo County Sheriff's Office Policies and Procedures and any existing jail surveillance videos of the events or locations of events which are the subject of this case.

5. These are excepted from public disclosure for security and safety reasons under the Texas Government Code and public dissemination would be likely to result in interference with law enforcement operations.

WHEREFORE, PREMISES CONSIDERED, the parties pray that the Court grant the relief requested and for such other and further relief, at law or in equity, to which they may show themselves to be justly entitled.

Respectfully submitted,

*/s/ Preston Edward Henrichson*

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*Attorney in Charge for Defendant*  
*Hidalgo County*

*/s/ Jessica Bebawi by PH with permission*

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**Jessica Bebawi**

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**CERTIFICATE OF SERVICE**

On October 10, 2025 a true and correct copy of the foregoing instrument was served on the following persons in accordance with the Federal Rules of Civil Procedure:

**Via CM/ECF**

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*/s/ Preston E. Henrichson*

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Preston E. Henrichson